FEDERAL ELECTION COMMISSION

WASHINGTON OF BRIDE

Sidney Jacob, Treasurer
Political Action Committee of the
American Hospital Association
840 North Lake Drive
Chicago, IL 60611

JUN 1 5 1994

Identification Number: C00106146

Reference: Amended Year End Report (12/1/93-12/31/93) dated

2/22/94

Dear Mr. Jacob:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your amended Year End Report includes additional and reclassified receipts that appears to have been received in previous reporting periods. Please be advised, errors, additions, omissions, reclassifications, and incomplete information must be corrected or supplied by amending the original report in which the activity occurred. Failure to correct the original report will create difficulties in accounting for cash flow from one report to another. In addition, all subsequent report(s) that are affected by these corrections must be amended also. Please amend your report(s) accordingly.

-Line 11(a)(i) of the Detailed Summary Page discloses a figure for the total amount of itemized contributions from individuals/persons other than political committees. In addition, insufficient supporting schedules have been provided. Please amend your report by itemizing all contributions from individuals/persons, which aggregate greater than \$200 in the calendar year. 11 CFR \$104.3(a)(2)

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C.

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\$\$441a(f) and 441b or 11 CFR \$102.5(b). Under 11 CFR \$102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR \$103.3(b). The Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

A written response or an amendment to your original report(6) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Edward D. Ryan

Reports Analyst

Reports Analysis Division

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AMERICAN HOSPITAL ASSOCIATION POLITICAL ACTION COMMITTER CO-010646 SUPPORTING SCHEDULE FOR DETAILED SUMMARY Page 2, FEC Form 3X

	Current Report	Year - To - Date
Line 12 - Transfers LCOM Affiliated Party Committees PAC - California HOSPAC Federal - NY HOSPAC Federal - NC HOSPAC Federal - PA (HOSPAC Federal - UT	\$ _3.205.00 \$ 3.205.00	\$ 51,600.00 7,642.00 13,500.00 28,000.00 3,205.00 \$722 \$103.947.00
Line 17 : Investment Income* .SUPER NOW Disbursement #956094 .Insured Money Market #9900754	\$ 524.56 150.51 \$ 675.09	\$ 5,046.68 1.818.32 5 6,865.00
Line 21 - Operating Expenditures .IRS-1992 taxes .IRS-1993 estimate .IL Dept. of Revenue-1992 taxes .IL Dept. of Revenue-1993 estimat	: e	\$ 2,889.63 3,000.00 449.69 600.00 \$ 5,939.32

*Source for all investment income: Pirst Security Bank of Chicago 196 Bast Pearson Chicago, IL 60611 412/280-2385

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The Hospital Association of LA

170: \$6,000,00

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AMERICAN HOSPITAL ASSOCIATION POLITICAL ACTION COMMITTEE CO 7: 544 SUPPORTING SCHEDULE FOR DETAILED SUMMARY Page 2, FEC Form 3X

	Current Report	Year-To-Date
Line 12 - Transfers from Affiliated Party Committees .PAC - California .HOSPAC Federal - NY .HOSPAC Federal - NC (.HOSPAC Federal - GA .HOSPAC Federal - PA	\$ 5,000.00 6,000.00 14,000.00 \$25,000.00	\$51,600.00 7,642.00 12,000.00 6,000.00 14,000.00 \$91,242.00
Line 17 - Investment Income: .SUPER NON Disbursement #956094 .Insured Money Market #9900754	\$ 441.78 149.28 \$ 591.06	\$ 3,154.46 1.227.76 \$ 4.382.22
Line 21 - Operating Expenditures IRS-1992 taxes IRS-1993 estimate IL Dept. of Revenue-1992 taxes IL Dept. of Revenue-1993 estima		\$ 2,899.63 3,096.00 449.69 500.00 \$ 6,939.32

*Source for all investment income: Pirst Security Bank of Chicago 196 East Pearson Chicago, IL 60611 312/280-0360

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